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12 *Attorneys for Plaintiff*

13
14
15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

17 ERIN ALLEN,

18 Plaintiff,

19 vs.

20 VOCATUS, LLC, a Nevada Limited
21 Liability Company; SHAMOUN'S, LLC, a
22 Nevada Limited Liability Company; and
23 DOES and ROE entities I – X, inclusive,

24 Defendants.

25 Case No. 2:21-cv-00377-APG-DJA

26 **STIPULATION AND ORDER TO
27 EXTEND TIME FOR PARTIES TO
28 SUBMIT JOINT PRETRIAL ORDER
(FIRST REQUEST)**

29 Plaintiff ERIN ALLEN ("Plaintiff"), and Defendants VOCATUS, LLC and
30 SHAMOUN'S, LLC ("Defendants"), through their respective attorneys of record, stipulate to,
31 and agree upon, a thirty (30) day extension of the deadline to submit a joint pretrial order, as
32 follows.

33 On May 4, 2022, Defendants filed their Motion for Summary Judgment, [ECF 35],
34 which Plaintiff opposed. On December 12, 2022, this Court entered its Order granting in part
35 and denying in part Defendants' Motion for Partial Summary Judgment. [ECF 54]. Pursuant to
36 most recent scheduling order, [ECF 34], the parties are due to submit their joint pretrial order
37 thirty (30) days from the Court's Order regarding Defendants' Motion for Partial Summary

1 Judgment, *i.e.*, January 11, 2023.

2 Because of the holidays and Plaintiff's counsel's on-going family medical emergency,
3 the parties have been unable to meet and confer with regard to the joint pretrial order. To give
4 the parties sufficient time to meet and confer to finalize the joint pretrial order, the parties
5 hereby stipulate and agree the parties shall have until **February 10, 2023**, to submit the joint
6 pretrial order.

7 This is the first request to extend the joint pretrial order deadline and is not made for
8 purposes of undue delay.

9 Dated this 6th day of January, 2023.

10 **HKM EMPLOYMENT ATTORNEYS LLP**

11 *By: /s/ Jenny L. Foley*
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Attorneys for Plaintiff

10 **OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

11 *By: /s/ Michelle C. Krakora*
12 SUZANNE L. MARTIN, ESQ.
13 Nevada Bar No. 8833
14 MICHELLE C. KRAKORA, ESQ.
15 Nevada Bar No. 8832
16 10801 W. Charleston Blvd., Suite 500
17 Las Vegas, Nevada 89135
18 Telephone: (702) 369-6800
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michelle.krakora@ogletree.com
Attorneys for Defendants

21 **ORDER**

22 IT IS SO ORDERED:

23 DATED: January 11, 2023

24 
25 DANIEL J. ALBREGTS
26 UNITED STATES MAGISTRATE JUDGE

EXHIBIT 1

Damas, Gabriela

From: Krakora, Michelle C. <michelle.krakora@ogletree.com>
Sent: Friday, January 6, 2023 12:24 PM
To: Arata, Mike
Cc: Martin, Suzanne L.; Foley, Jenny; Damas, Gabriela; 36f4c7597+matter1429345382@maildrop.clio.com
Subject: RE: Allen/Vocatus Call to Discuss Settlement/Joint Pretrial Order

You don't often get email from michelle.krakora@ogletree.com. [Learn why this is important](#)

Thanks Mike. You have our permission to file.

Michelle

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From: Arata, Mike <marata@hkm.com>
Sent: Friday, January 6, 2023 12:16 PM
To: Krakora, Michelle C. <Michelle.Krakora@ogletreedeakins.com>
Cc: Martin, Suzanne L. <suzanne.martin@ogletreedeakins.com>; Foley, Jenny <JFoley@hkm.com>; Damas, Gabriela <gdamas@hkm.com>; 36f4c7597+matter1429345382@maildrop.clio.com
Subject: RE: Allen/Vocatus Call to Discuss Settlement/Joint Pretrial Order

[Caution: Email received from external source]

Hi Michelle:

Here is the proposed stipulation. Please let us know if you have any edits or if we can submit the stipulation with your electronic signature.

Thanks,
Mike



Mike Arata
Attorney

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From: Krakora, Michelle C. <michelle.krakora@ogletree.com>
Sent: Wednesday, January 4, 2023 12:23 PM
To: Foley, Jenny <JFoley@hkm.com>
Cc: Martin, Suzanne L. <suzanne.martin@ogletreedeakins.com>; Arata, Mike <marata@hkm.com>
Subject: RE: Allen/Vocatus Call to Discuss Settlement/Joint Pretrial Order

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Sorry to hear that. Yes, we can stipulate to a 30 day extension--- please prepare the stipulation. It needs to be filed before January 11, 2023.

Thanks,
Michelle

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From: Foley, Jenny <JFoley@hkm.com>
Sent: Wednesday, January 4, 2023 9:37 AM
To: Krakora, Michelle C. <Michelle.Krakora@ogletreedeakins.com>
Cc: Martin, Suzanne L. <suzanne.martin@ogletreedeakins.com>; Arata, Mike <marata@hkm.com>
Subject: Re: Allen/Vocatus Call to Discuss Settlement/Joint Pretrial Order

[Caution: Email received from external source]

Hi Michelle,
My mom has been in the hospital for quite a while, and I've gotten further behind than I should be. Would your client stipulate to a 30 day extension to submit the pretrial order etc?

Jenny



Jenny Foley, Ph.D. (she/her)
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From: Krakora, Michelle C. <michelle.krakora@ogletree.com>

Sent: Tuesday, December 13, 2022 2:15 PM

To: Foley, Jenny <JFoley@hkm.com>

Cc: Martin, Suzanne L. <suzanne.martin@ogletreedeakins.com>; Arata, Mike <marata@hkm.com>

Subject: Allen/Vocatus Call to Discuss Settlement/Joint Pretrial Order

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Jenny:

We are in receipt of the Court's order on Defendants' MSJ and are reaching out to get your availability for a call to discuss settlement and preparation of the joint pretrial order, pursuant to LR 16-3. Given the upcoming holidays, and the relatively short 30 day timeline for filing the joint pretrial order, we would like to speak sooner than later. Are you available Thursday or Friday this week or early next week?

Thanks,

Michelle C. Krakora | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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